



October 19, 2017

VIA ECF

J. Scott Tarbutton

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The Honorable George B. Daniels
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
Room 1310
New York, NY 10007

The Honorable Sarah Netburn
Thurgood Marshall United
States Courthouse
40 Foley Square
Room 430
New York, NY 10007

**Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN);
Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al.
v. Kingdom of Saudi Arabia, et al., Case No. 1:17-cv-07914**

Dear Judge Daniels and Judge Netburn:

This firm represents the plaintiffs in *Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. Kingdom of Saudi Arabia, et al.*, Case No. 1:17-cv-07914, a new action filed with the United States District Court for the Southern District of New York on October 13, 2017, asserting claims against defendants Kingdom of Saudi Arabia and the Saudi High Commission for Relief of Bosnia & Herzegovina (“SHC”) (the “Sovereign Defendants”), along with claims against defendants Al Rajhi Bank, National Commercial Bank (“NCB”), and Saudi Binladin Group (“SBG”) (the “Non-Sovereign Defendants”).

Pursuant to the Court’s Order of May 3, 2017 (ECF No. 3543), plaintiffs filed a Short Form Complaint and Demand for Jury Trial incorporating the specific allegations of the March 17, 2017 *Consolidated Amended Complaint* (“CAC”) as to the Kingdom and SHC. *See* ECF No. 3463. As contemplated by the Court’s May 3, 2017 Order, and as stated in their Complaint, plaintiffs agree that their Complaint shall be deemed subject to the renewed motions to dismiss filed by the Sovereign Defendants on August 1, 2017 at ECF Nos. 3667-3669 and 3670-3672.

Further, plaintiffs’ Short Form Complaint incorporates the specific allegations of the May 19, 2017 First Amended Complaint (“FAC”) in *Underwriting Members of Lloyd’s Syndicate 2, et al. v. Al Rajhi Bank, et al.*, Case No. 16-cv-07853, as to Al Rajhi Bank, NCB, and SBG. *See* ECF No. 56. As contemplated by the Court’s May 16, 2017 Order (ECF No. 3584), and as stated in their Complaint, plaintiffs agree that their Complaint shall be deemed subject to the motions to dismiss filed by the Non-Sovereign Defendants on August 21, 2017 at ECF Nos. 3691-3692, 3700-3701, and 3702-3703.

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Plaintiffs respectfully request that *Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. Kingdom of Saudi Arabia, et al.*, Case No. 1:17-cv-07914, be made part of *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570. We thank the Court for its consideration of this matter.

Respectfully,

COZEN O'CONNOR



J. SCOTT TARBUTTON

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cc: All MDL 1570 Counsel (via ECF)

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